

Message

---

**From:** Mahdavi, Sarvy [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=2E69D0B569044A03BC68108525410682-SMAHDAVI]  
**Sent:** 6/14/2018 6:23:35 PM  
**To:** Pankratz, Shannon L SPL [Shannon.L.Pankratz@usace.army.mil]  
**Subject:** FW: Petersen Ranch Mitigation Bank 2nd Credit Release [USACE FILE NO: SPL-2012-00669-BEM, CDFW TRACKING NO: 1600-2015-0075-R5]  
**Attachments:** 2nd Credit Release Full Signed 06-06-18.pdf

Hi Shannon, what is your next step on this? And what do you need from us (me)?

Thanks!

Sarvy

**From:** Nate Bello [mailto:[bello@wra-ca.com](mailto:bello@wra-ca.com)]  
**Sent:** Wednesday, June 06, 2018 2:02 PM  
**To:** Mahdavi, Sarvy <Mahdavi.Sarvy@epa.gov>  
**Cc:** Zimmerman, Jan@Waterboards <[jan.zimmerman@waterboards.ca.gov](mailto:jan.zimmerman@waterboards.ca.gov)>; Wong, Warren@Wildlife <[Warren.Wong@wildlife.ca.gov](mailto:Warren.Wong@wildlife.ca.gov)>; Andrew Cawley <[cawley@wra-ca.com](mailto:cawley@wra-ca.com)>; Tracey Brownfield <[tracey@landveritas.com](mailto:tracey@landveritas.com)>; Pankratz, Shannon L SPL <[Shannon.L.Pankratz@usace.army.mil](mailto:Shannon.L.Pankratz@usace.army.mil)>  
**Subject:** Re: Petersen Ranch Mitigation Bank 2nd Credit Release [USACE FILE NO: SPL-2012-00669-BEM, CDFW TRACKING NO: 1600-2015-0075-R5]

Dear IRT,

Please find attached the resubmitted letter requesting the 2nd credit release from Areas A and E of the Petersen Ranch Mitigation Bank. We have revised the letter according to your previous feedback with the credit release now matching what was presented in the BEI, and a new Table 10 to help explain the endowment funding.

If you have any additional questions or comments please do not hesitate to contact me.

Thank you,

Nate

---

**Nathan Bello** | Conservation Biologist/Planner | d: 415.524.7238 | o: 415.454.8868 x 1800 | c: 916.508.4993 | [bello@wra-ca.com](mailto:bello@wra-ca.com)

**WRA, Inc.** | [www.wra-ca.com](http://www.wra-ca.com) | 2169-G East Francisco Blvd., San Rafael, CA 94901 | San Diego | Fort Bragg | Denver

---

On Fri, May 25, 2018 at 11:17 AM, Nate Bello <[bello@wra-ca.com](mailto:bello@wra-ca.com)> wrote:

Dear IRT,

Thank you all for the review and the feedback, and I apologize for causing confusion. We followed the credit adjustment methodology we were directed to use for the Soquel Canyon Mitigation Bank following the as-built, but the sponsor is happy to simplify and just go with the number of credits from the original PRMB banking documents. We will revise and resubmit along with an explanation of the endowment funding to-date.

Thanks all for your work on the project,

Nate

On Tue, May 22, 2018 at 2:52 PM, Mahdavi, Sarvy <[Mahdavi.Sarvy@epa.gov](mailto:Mahdavi.Sarvy@epa.gov)> wrote:

Nate,

I concur; the revised totals and adjustments confused me.

EPA recommends that no adjustments on credits be made based on As-Built; only after year 5, when a wetlands delineation can confirm final acres, should we then discuss how to properly adjust for extra credits.

Thanks,  
Sarvy

---

**From:** Zimmerman, Jan@Waterboards [<mailto:jan.zimmerman@waterboards.ca.gov>]

**Sent:** Monday, May 21, 2018 6:03 PM

**To:** Wong, Warren@Wildlife <[Warren.Wong@wildlife.ca.gov](mailto:Warren.Wong@wildlife.ca.gov)>; Nate Bello <[bello@wra-ca.com](mailto:bello@wra-ca.com)>; Andrew Cawley <[cawley@wra-ca.com](mailto:cawley@wra-ca.com)>; Tracey Brownfield <[tracey@landveritas.com](mailto:tracey@landveritas.com)>

**Cc:** Pankratz, Shannon L SPL <[Shannon.L.Pankratz@usace.army.mil](mailto:Shannon.L.Pankratz@usace.army.mil)>; Mahdavi, Sarvy <[Mahdavi.Sarvy@epa.gov](mailto:Mahdavi.Sarvy@epa.gov)>

**Subject:** RE: Petersen Ranch Mitigation Bank 2nd Credit Release [USACE FILE NO: SPL-2012-00669-BEM, CDFW TRACKING NO: 1600-2015-0075-R5]

I too was confused regarding the revised totals and release adjustment columns. An explanation would be appreciated.

Thanks! Jan

---

**From:** Wong, Warren@Wildlife [<mailto:Warren.Wong@wildlife.ca.gov>]

**Sent:** Monday, May 21, 2018 2:28 PM

**To:** Nate Bello <[bello@wra-ca.com](mailto:bello@wra-ca.com)>; Andrew Cawley <[cawley@wra-ca.com](mailto:cawley@wra-ca.com)>; Tracey Brownfield <[tracey@landveritas.com](mailto:tracey@landveritas.com)>

**Cc:** Zimmerman, Jan@Waterboards <[jan.zimmerman@waterboards.ca.gov](mailto:jan.zimmerman@waterboards.ca.gov)>; Pankratz, Shannon L SPL <[Shannon.L.Pankratz@usace.army.mil](mailto:Shannon.L.Pankratz@usace.army.mil)>; Sarvy Mahdavi <[Mahdavi.Sarvy@epa.gov](mailto:Mahdavi.Sarvy@epa.gov)>

**Subject:** RE: Petersen Ranch Mitigation Bank 2nd Credit Release [USACE FILE NO: SPL-2012-00669-BEM, CDFW TRACKING NO: 1600-2015-0075-R5]

Hi Nate,

Thank you for the nudge! I looked over the 2<sup>nd</sup> release request and was having trouble following the credit calculations involved. I spoke with Shannon and we think the Revised Totals and Release Adjustments columns need to be removed. This second release should be 25% of what was agreed upon (by agency/credit type) in the BEI/Development Plan. If those release amounts/numbers are to be changed now, we would likely need to amend the BEI.

Also, if you can give a brief summary of how the 15% endowment amount was calculated, that will help my (aging/feeble) memory.

With those columns out and the endowment calc clarified, I should be able to get the DFW letter out quickly.

Please give me a call if you have questions. I'll be out starting Wednesday, but will be back next Tuesday.

Warren

Warren Wong

Senior Environmental Scientist - Specialist

South Coast Region Banking Coordinator

California Department of Fish and Wildlife

3883 Ruffin Road

San Diego, California 92123

(858) 627-3997

**From:** Nate Bello <[bello@wra-ca.com](mailto:bello@wra-ca.com)>

**Sent:** Friday, May 11, 2018 2:18 PM

**To:** Andrew Cawley <[cawley@wra-ca.com](mailto:cawley@wra-ca.com)>; Tracey Brownfield <[tracey@landveritas.com](mailto:tracey@landveritas.com)>

**Cc:** Zimmerman, Jan@Waterboards <[jan.zimmerman@waterboards.ca.gov](mailto:jan.zimmerman@waterboards.ca.gov)>; Pankratz, Shannon L SPL <[Shannon.L.Pankratz@usace.army.mil](mailto:Shannon.L.Pankratz@usace.army.mil)>; Wong, Warren@Wildlife <[Warren.Wong@wildlife.ca.gov](mailto:Warren.Wong@wildlife.ca.gov)>; Sarvy Mahdavi

<Mahdavi.Sarvy@epa.gov>

**Subject:** Re: Petersen Ranch Mitigation Bank 2nd Credit Release [USACE FILE NO: SPL-2012-00669-BEM, CDFW TRACKING NO: 1600-2015-0075-R5]

Hello IRT,

Shannon, Warren and Sarvy I know you have all told me that you are incredibly busy right now, Jan I imagine you are in the same boat as well. So this is just a friendly nudge to remind you of our outstanding request for approval of the 2nd credit release from Petersen Ranch. We would like to get this approved within the next few weeks if possible, let me know if there is anything I can do to help.

Thanks and have a great weekend all,

Nate

---

**Nathan Bello** | Conservation Biologist/Planner | d: 415.524.7238 | c: 415.454.8868 x 1800 | c: 916.508.4993 | [bello@wra-ca.com](mailto:bello@wra-ca.com)

**WRA, Inc.** | [www.wra-ca.com](http://www.wra-ca.com) | 2169-G East Francisco Blvd., San Rafael, CA 94901 | San Diego | Fort Bragg | Denver

On Thu, May 3, 2018 at 8:59 AM, Nate Bello <[bello@wra-ca.com](mailto:bello@wra-ca.com)> wrote:

Hello IRT,

I wanted to follow up on this request for the 2nd credit release at the Petersen Ranch M.B. We are talking to a permittee who needs a large amount of 404 credits very soon that I think will require the second credit release to move forward. When you have a moment could you let me know an ETA for approval or if you need any additional information from us?

Thanks all,

Nate

**Nathan Bello** | Conservation Biologist/Planner | d: 415.524.7238 | o: 415.454.8868 x 1800 | c: 916.508.4993 | [bello@wra-ca.com](mailto:bello@wra-ca.com)

**WRA, Inc.** | [www.wra-ca.com](http://www.wra-ca.com) | 2169-G East Francisco Blvd., San Rafael, CA 94901 | San Diego | Fort Bragg | Denver

---

On Wed, Apr 11, 2018 at 4:45 PM, Andrew Cawley <[cawley@wra-ca.com](mailto:cawley@wra-ca.com)> wrote:

Dear IRT,

Nate Bello requested that I forward the revised 2nd credit release request for Areas A and E of Petersen Ranch Mitigation Bank. It has been edited to include language requesting Water Board authorization to release Porter Cologne credits as well. Please find the letter attached to this email.

As Nate mentioned in his previous email, the endowment has been funded according to our previous discussions and the ledgers in the letter include adjustments to account for as-built conditions as approved by the IRT in 2016 and 2017.

Please let us know if you have any additional questions.

Thank you

On Mon, Apr 9, 2018 at 4:21 PM, Nate Bello <[bello@wra-ca.com](mailto:bello@wra-ca.com)> wrote:

Thank you Jan. The intent is to ask for the Regional Board approval of the 2nd release as well. Sorry for the omission, we will revise and resend.

Thank you,

Nate

---

**Nathan Bello** | Conservation Biologist/Planner | d: 415.524.7238 | o: 415.454.8868 x 1800 | c: 916.508.4993 | [bello@wra-ca.com](mailto:bello@wra-ca.com)

On Mon, Apr 9, 2018 at 4:04 PM, Zimmerman, Jan@Waterboards <[jan.zimmerman@waterboards.ca.gov](mailto:jan.zimmerman@waterboards.ca.gov)> wrote:

Nate, the letter does not request Water Board authorization for the second credit release, yet it includes additional Porter-Cologne credits in Table 8 and Table 9. Please clarify whether Porter-Cologne credits are being requested. If so, revise the language in the request letter to indicate that is the purpose; if not, then remove the additional 25% of total available Porter-Cologne credits from the credit release tables (Table 8 and Table 9). The Porter-Cologne credit release schedule is to follow BEI section VII.B.1.b. Thank you.

Jan Zimmerman, P.G. #8392

Senior Engineering Geologist

Lahontan Regional Water Quality Control Board

760/241-7376

<http://waterboards.ca.gov/lahontan/>

**From:** Nate Bello <[bello@wra-ca.com](mailto:bello@wra-ca.com)>

**Sent:** Thursday, April 5, 2018 3:08 PM

**To:** Pankratz, Shannon L SPL <[Shannon.L.Pankratz@usace.army.mil](mailto:Shannon.L.Pankratz@usace.army.mil)>; Wong, Warren@Wildlife <[Warren.Wong@wildlife.ca.gov](mailto:Warren.Wong@wildlife.ca.gov)>; Sarvy Mahdavi <[Mahdavi.Sarvy@epa.gov](mailto:Mahdavi.Sarvy@epa.gov)>; Zimmerman, Jan@Waterboards <[jan.zimmerman@waterboards.ca.gov](mailto:jan.zimmerman@waterboards.ca.gov)>

**Subject:** Petersen Ranch Mitigation Bank 2nd Credit Release [USACE FILE NO: SPL-2012-00669-BEM, CDFW TRACKING NO: 1600-2015-0075-R5]

Dear IRT,

Please find enclosed the 2nd credit release request for Area's A and E of the Petersen Ranch Mitigation Bank. The Sponsor has funded the endowment according to our previous discussions and the ledgers in this letter include adjustments to account for as-built conditions as approved by the IRT in 2016 and 2017. Please let me know if you have any questions, or if there is any other information I can provide to assist you in your review and approval of the 2nd credit release.

Thank you,

Nate

---

**Nathan Bello** | Conservation Biologist/Planner | d: 415.524.7238 | o: 415.454.8868 x 1800 | c: 916.508.4993 | [bello@wra-ca.com](mailto:bello@wra-ca.com)

**WRA, Inc.** | [www.wra-ca.com](http://www.wra-ca.com) | 2169-G East Francisco Blvd., San Rafael, CA 94901 | San Diego | Fort Bragg | Denver

--

---

**ANDREW CAWLEY** | Mitigation Banking Specialist | d: 415.524.7537 | o: 415.454.8868 x 1380 | c: 510.768.7537 | [acawley@wra-ca.com](mailto:acawley@wra-ca.com)

**WRA, Inc.** | [www.wra-ca.com](http://www.wra-ca.com) | 2169-G East Francisco Blvd., San Rafael, CA 94901 | Emeryville | San Diego | Fort Bragg | Denver